COLORADO DISCHARGE PERMIT SYSTEM (CDPS)
FACT SHEET FOR PERMIT NUMBER CO0024147
CITY OF BOULDER - 75TH STREET WASTEWATER TREATMENT FACILITY
BOULDER COUNTY

TABLE OF CONTENTS

I. TYPE OF PERMIT

A. Permit Type: Minor Amendment

B. Discharge To: Surface Water

II. FACILITY INFORMATION

A. SIC Code: 4952 Sewerage Systems

B. Facility Classification: Class A per Section 100.5.2 of the Water and Wastewater Facility Operator Certification Requirements

C. Facility Location: 4049 N. 75th Street, Boulder, CO 80301, Latitude: 40° 3' 4.95" N, Longitude: 105° 10' 38.94" W

D. Permitted Feature: Outfalls 001A and 001B, following disinfection and prior to mixing with Boulder Creek.

The location(s) provided above will serve as the point(s) of compliance for this permit and are appropriate as they are located after all treatment and prior to discharge to the receiving water.

E. Facility Flows: 25 MGD

III. PURPOSE OF MODIFICATION

A request for modification from the City of Boulder (the Permittee) was received by the Division on October 29, 2012. The Permittee requested that the total arsenic (chronic) limitations of the permit be modified to reflect the recent temporary modification for arsenic adopted by the Water Quality Control Commission (WQCC) on October 9, 2012.

The WQCC adopted a temporary modification type A and B for arsenic (chronic) set at “current condition” for Boulder Creek Segment 9 (COSPBO09), with an effective date of March 1, 2013, and expiration date of

06/30/2017.

IV. CHANGES AS A RESULT OF THE MODIFICATION

The temporary modification for arsenic is set at "current condition" and based on "uncertainty." It is the intention of the WQCC that when implementing this temporary modification in a CDPS permit, and interpreting the term current condition, the Division will assess the current effluent quality, recognizing that it changes over time due to variability in treatment plant removal efficiency and influent loading from industrial, commercial, and residential sources. One necessary element of an approach to maintain the current condition would be a requirement that the total loading from commercial and industrial contributors be maintained at that level as of the date of adoption of the temporary modification.

The permit itself expires on April 30, 2016, well before the temporary modification expires (June 30, 2017). Therefore the underlying standard will be addressed in the renewal permit and the arsenic conditions for the remainder of this permit term will be report only. However, a narrative condition for arsenic has been included to require that commercial and industrial contributions of arsenic remain at the current levels, similar to the requirement for copper in the permit.

A compliance schedule was included in the permit, giving the permittee until May 31, 2013 to meet the permit limit of 0.023 µg/l. Since a compliance schedule cannot be placed during a type A and B temporary modification period, and the permit expires on April 30, 2016, before the temporary modification expires, the compliance schedule will be removed from the permit.

1. Part I.A.1., the sub heading "Copper Annual Report" has been modified to include arsenic. This requirement is to ensure that the total loading from commercial and industrial contributors is maintained at the same level as of the date of adoption of the temporary modification.
2. Part I.A.1. Tables for Outfalls 001A and 001B. The limitation for arsenic has been changed to Report for the entire permit term, eliminating the effective date of the underlying standard.
3. Part I.B.7. - Compliance Schedule, has been modified and all reference to total recoverable arsenic has been removed.

Abigail Ogbe
12/20/12

V. PUBLIC NOTICE COMMENTS

The public notice period was from November 16, 2012 to December 17, 2012. Comments were received from the City of Boulder. Topical summaries of the comments and the response of the Division are given below. Copies of the comments are located in Division files and will be made available upon request.

Comment 1:
Permit age 3 of 35 - Part I, A-Effluent Limitations and Monitoring Requirements. Under the paragraph "Arsenic and Copper Annual Report" Change this parameter to "these parameters".

Response 1: The correction is done.

Comment 2:

Permit age 3 of 35 - Part I, A-Effluent Limitations and Monitoring Requirements. Under the paragraph "Arsenic and Copper Annual Report." It is the city's interpretation that a single annual report including information on both arsenic and copper shall be submitted on or before May 1 of each year. The city will proceed in this fashion unless directed otherwise by the Division.

Response 2:
Since the annual report for copper is due on May 1 of each year, the permit has been modified to specify that the due date for the report for both arsenic and copper is on or before May 1, of each year.

Comment 3:
Compliance Schedule(s): Under subparagraph (a) titled "Activities to Meet Hexavalent Chromium and Cyanide Final Limits", insert the word "and" as follows: "In order to meet Hexavalent Chromium and Cyanide limitations, the following schedule will be required."

Response 3: The correction is done.

Comment 4:
Under subparagraph (a) titled "Activities to Meet Hexavalent Chromium and Cyanide Final Limits" the first two events (codes 43699 and 00899) have been accomplished and included arsenic. The city raises the question about whether or not to modify language to remove references to arsenic in these first two events. The city agrees, of course, to removing reference to arsenic for the final event (code CS017).

Response 4:
The reference to arsenic in the first two items has been removed just to eliminate any future confusion as to whether or not arsenic was to be included throughout the compliance schedule.

Abigail Ogbe
12/20/12